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SURGERY MEDICAL GROUP, INC.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE DISTRICT OF MASSACHUSETTS**

11 IN RE: NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
12 LITIGATION )

MDL No. 2419  
Master Dkt. 1:13-md-02419-RWZ

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14 THIS DOCUMENT RELATES TO:

15 *Jeffries, et al. v. Ameridose, et al.*  
Docket No. 1:14-cv-12789-RWZ  
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18 **STIPULATION TO FURTHER EXTEND TIME FOR DEFENDANTS,**  
19 **EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., AND**  
20 **FULLERTON ORTHOPAEDIC SURGERY MEDICAL GROUP, INC.,**  
**TO RESPOND TO PLAINTIFFS' COMPLAINT**

21 IT IS HEREBY STIPULATED between Plaintiffs, JOHN EDWARDS JEFFRIES, by and  
22 through his SUCCESSOR IN INTEREST CLAY C. JEFFRIES, and CLAY C. JEFFRIES, CYNTHIA  
23 A. CARDEY, PARTRICK J. JEFFRIES, WYNEMA K. HYNDMAN, JOHN E. JEFFRIES, JR. and  
24 REED JEFFRIES, individually, by and through their counsel of record, and Defendants, EUGEN D.  
25 WILLIAMS, M.D., LINDA LUI LUONG, P.A., and FULLERTON ORTHOPAEDIC SURGERY  
26 MEDICAL GROUP, INC., through their counsel of record, that the time in which the foregoing  
27 Defendants may respond to the Complaint, either by Answer or otherwise, is hereby extended for a  
28 further four weeks. Defendants' response shall be due on or before November 12, 2014.

1 IT IS SO STIPULATED.

2 Dated: October 13, 2014

3 LA FOLLETTE, JOHNSON, DEHAAS, FESLER & AMES

4  
5  
6 BY: 

DENNIS K. AMES, ESQ.  
ROBERT J. IACOPINO, ESQ.  
Attorneys for Defendants  
EUGEN D. WILLIAMS, M.D.,  
LINDA LUI LUONG, P.A., and  
FULLERTON ORTHOPAEDIC  
SURGERY MEDICAL GROUP, INC.

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8  
9  
10  
11 Dated: October 14, 2014

12 JANET, JENER & SUGGS, LLC

13  
14 BY: /s/ Kimberly A. Dougherty

ROBERT K. JENNER, ESQ.  
KIMBERLY A. DOUGHERTY, ESQ.  
Attorneys for Plaintiffs,  
CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries,  
CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
E. JEFFRIES, JR., AND REED JEFFRIES.

**PROOF OF SERVICE**  
(C.C.P. §1013(a) and §2015.5)

STATE OF CALIFORNIA    )  
  )  
COUNTY OF ORANGE    )

I, am employed in the County of Orange, State of California. I am over the age of eighteen years and not a party to the within action. I am employed with the law offices of La Follette, Johnson, De Haas, Fesler & Ames, 2677 N. Main Street, Suite 901, Santa Ana, California 92705.

On October 14, 2014, I served the within document entitled **STIPULATION TO FURTHER EXTEND TIME FOR DEFENDANTS, EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., AND FULLERTON ORTHOPAEDIC SURGERY MEDICAL GROUP, INC., TO RESPOND TO PLAINTIFFS' COMPLAINT** on all interested parties in this action by placing ☐ the original ☒ a true copy thereof, enclosed in a sealed envelope addressed as follows:

**VIA E-MAIL AND U.S. MAIL**  
**SEE ATTACHED SERVICE LIST**

- ☒ **MAIL** - I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Ana, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.
- ☐ **BY PERSONAL SERVICE** - Such envelope(s) were delivered by hand to the office(s) of the addressee(s).
- ☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION** - I caused the document(s) to be sent to the person(s) at the e-mail address(es) listed on the Service List. I did not receive, within a reasonable time after transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☐ **VIA FACSIMILE** - I transmitted to the above-named person(s), at the FAX number(s) listed above, the above-named document, pursuant to Rule 2008. The facsimile machine that I used complies with Rule 2003(3) and no error was reported.
- ☒ **STATE** - I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- ☐ **FEDERAL** - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 14, 2014, at Santa Ana, California.

  
MONICA SALT

**IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY LITIGATION**

**MDL No. 2419**

**Master Dkt. 1:13-md-02419-RWZ**

**John Edward Jeffries, et al. V. Ameridose LLC, et al.**

**Court - USDC**

**Case NO.: CV14-00844-AG (JCGx)**

**Our File No.: 903.37421 DKA/RJI**

**Attorneys for Plaintiffs John Edward Jeffries, et al.**

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